

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
(GREENBELT DIVISION)**

In Re:

Aligned Development, LLC

Debtor(s)

Case No. 24-11929-LSS

Chapter 11

WCP Fund I, LLC, as Servicer for  
Pacific RBLF Funding Trust  
Movant,

v.

Aligned Development, LLC

Respondent.

**RESPONDENT'S OPPOSITION TO MOTION FOR RELIEF FROM AUTOMATIC  
STAY**

Comes now the defendant Aligned Development, LLC by and through its attorney Richard Basile and in opposition to Movant's Motion for Automatic Stay states:

1. The allegations of Movant are generally denied, although monies are due and owing to the Movant.
2. The allegations of Movant are irrelevant to the granting of relief from automatic stay.
3. The debtor at this point in time is not yet required to file a plan of reorganization.
4. The debtor has opened a debtor in possession account.
5. The debtor will be funding his plan of reorganization through a refinance of the debtor's property.
6. There is equity in the property and the property is necessary for reorganization.

7. There is adequate protection for the Movant who is a creditor secured by a deed of trust encumbering debtor's real estate.
8. The debtor has no leases or executory contracts and thus there are no leases or executory contracts to schedule.
9. The Movant's motion is premature at the present time.

Wherefore, Debtor moves this Court to deny Movant's Motion for Relief from Automatic Stay.

/s/ Richard S. Basile

Richard S. Basile, Esq.

CPF: 78060-10005

6305 Ivy Lane, Suite 510

Greenbelt, Maryland 20770

(301) 441-4900

rearsb@gmail.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 3 day of July, 2024, a copy of the foregoing Opposition to Motion for Relief from Automatic Stay was sent via first class mail, postage prepaid, and/or sent via email to:

Maurice B. VerStandig  
The VerStandig Law Firm, LLC  
1452 W. Horizon Ridge Parkway #665  
Henderson, Nevada 89012  
[mac@mbvesq.com](mailto:mac@mbvesq.com)

Lynn Kohen, U.S. Trustee  
[lynn.a.kohen@usdoj.gov](mailto:lynn.a.kohen@usdoj.gov)

/s/ Richard S. Basile  
Richard S. Basile, Esq.  
CPF: 7806010005  
6305 Ivy Lane, Suite 510  
Greenbelt, Maryland 20770  
(301) 441-4900  
[rearsb@gmail.com](mailto:rearsb@gmail.com)